

February 6, 2009

Enforcement Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: EB-06-36, Richard A. Sullivan
Certification of CPNI Filing for Calendar Year 2008

To Whom It May Concern:

This certification and accompanying statement for the calendar year 2008 is sent pursuant to FCC 07-22 released April 1, 2008 and Section 64.2009(e) of the Commission's rules and updated by Public Notice, DA 09-9, released January 7, 2009, in connection with Customer Proprietary Network Information.

If there are any questions in connection with this filing, please contact this office.

Respectfully submitted,



Audrey P. Rasmussen

APR:gln
Enclosure

76484.1:735689:00600

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for year 2008

Date filed: date February 6, 2009

Name of company(s) covered by this certification: company RICHARD A SULLIVAN

Form 499 Filer ID: provide ID(s) - 819178

Name of signatory: name RICHARD A SULLIVAN

Title of signatory: title OWNER
Richard A. Sullivan

I, name of officer signing certification, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is/ is not in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules attach accompanying statement.

The company has/has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: Provide explanation of any actions taken against data brokers - None.

The company has/has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI - None.

Signed Richard A. Sullivan signature

STATEMENT REGARDING OPERATING PROCEDURES

Richard A. Sullivan ("Carrier") has established operating procedures that ensure compliance with the rules and regulations of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI), 47 C.F.R. Sections 64.2001-2009.

Carrier has a system in place in which the status of each customer's CPNI approval can be established prior to any use, disclosure or access.

Carrier trains its employees in the authorized use of CPNI. Carrier has established disciplinary procedures for any employee which does not adhere to Carrier's CPNI procedures.

Carrier retains a record of the sales and marketing campaigns of it and its affiliates which use the CPNI of customers and Carrier maintains a record of Carrier's compliance for at least the minimum of one year. Carrier's records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. CPNI notifications are provided to customers as required by the Commission's rules. Carrier maintains records of customer approval and notifications for the minimum period of one year.

Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for marketing situations. Sales personnel are required to obtain supervisory approval for any proposed marketing request.

Carrier maintains confidentiality agreements pursuant to the Commission's CPNI rules with any joint venture partner and independent contractor.